

June 24, 2004

Mr. Terry Graumann  
Authorized Account Representative  
Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496

Dear Mr. Graumann:

This is in response to your June 15, 2004 letter requesting EPA approval of your use of the rectangular duct wall effects conditional test method (CTM-041). You have provided all of the required information to begin using the correction factor on January 1, 2004 on the power plant and associated units and stacks/ducts in the attached table, provided that you perform CTM-041 in calendar year 2004.

Your wall effects adjusted data will be considered valid quality-assured data, retroactive to the start date and time of the rectangular duct wall effects adjustment, provided that: (1) all other Part 75 requirements are met; and (2) you do not adjust the rectangular duct cross-sectional area to account for any build-up of particulate matter or other material in the bottom of the duct when calculating stack gas volumetric flow.

We recommend that you follow the EDR reporting instructions available at the following internet address: [www.epa.gov/airmarkets](http://www.epa.gov/airmarkets), click on "Recent Additions" (in the upper left corner), scroll down and click on "Rectangular Duct Wall Effects", and that you run your EDR reports through the MDC software tool available at the same web site prior to submitting the EDRs to EPA. A spreadsheet to calculate rectangular duct wall effects is also available at the same web site. If you have any questions or concerns about this matter, please contact John Schakenbach of my staff at 202-343-9158 or at ([schakenbach.john@epa.gov](mailto:schakenbach.john@epa.gov)).

Sincerely,

/s/

Reynaldo Forte, Chief  
Emissions Monitoring Branch

Attachment

cc: Louis Nichols, EPA, CAMD, EMB  
Cindy Walke, EPA, CAMD, MOB  
Cecilia Mijares, EPA Region V  
Yolanda Hernandez, MNPCA  
Jim Kolar, MNPCA

Attachment

<b>Plant</b>	<b>Unit/Stack ID</b>	<b>ORISPL</b>	<b>Start Date/Time</b>
Hoot Lake	2	1943	1/1/2004 0000
	3	1943	1/1/2004 0000